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14 Attorneys for Plaintiff
15 GLINT INC.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA

18 GLINT INC., a Delaware corporation,

19 Plaintiff,

20 v.

21 PERCEPTYX, INC., a California corporation;
22 MITCHELL ANDERSON, an individual; and
23 DOES 1 through 10, inclusive,

24 Defendants.

25 CASE NO. 3:18-cv-02886-CRB

26 **DECLARATION OF SHEEVA J. GHASSEMI-
27 VANNI IN SUPPORT OF PLAINTIFF GLINT
28 INC.'S EX PARTE MOTION FOR
TEMPORARY RESTRAINING ORDER AND
EXPEDITED DISCOVERY**

1 I, Sheeva J. Ghassemi-Vanni, declare as follows:

2 1. I am a partner with the law firm of Fenwick & West LLP, counsel for Plaintiff
3 Glint Inc. ("Glint"). I am an attorney admitted to practice before this Court. I submit this
4 declaration in support of the Glint's Ex-Parte Motion for Temporary Restraining Order and
5 Expedited Discovery.

6 2. I make this declaration of my own personal knowledge, except to any extent
7 otherwise specified. If called as a witness, I could and would testify competently to the facts set
8 forth herein.

9 3. On May 11, 2018, I sent a detailed letter to Defendant Mitchell Anderson ("Mr.
10 Anderson") identifying the basis for Glint's claims and the facts supporting such claims. A true
11 and correct copy of the May 11, 2018 letter is attached hereto as **Exhibit A**. Mr. Anderson
12 responded in writing on the morning of May 14, 2018, which was the deadline I had set in
13 Exhibit A. A true and correct copy of the May 14, 2018 response letter is attached hereto as
14 **Exhibit B**.

15 4. On May 11, 2018, I sent a detailed letter to Defendant Perceptyx, Inc.
16 ("Perceptyx") identifying the basis of Glint's claims and the facts supporting such claims. A
17 true and correct copy of the May 11, 2018 letter is attached hereto as **Exhibit C**. Perceptyx
18 responded in writing on the morning of May 15, 2018, which was the deadline I had set in
19 Exhibit C. A true and correct copy of the May 15, 2018 response letter is attached hereto as
20 **Exhibit D**.

21 5. To date, both Mr. Anderson and Perceptyx have expressly denied all of the
22 allegations, except Mr. Anderson admitted to retaining certain Glint property (including
23 documents) due to working out of his home office and he indicated in his response that he was
24 in the process of returning such property to Glint.

25 I declare under penalty of perjury under the laws of the United States of America that the
26 foregoing is true and correct, and that this declaration was executed this 17th day of May, 2018
27 in Mountain View, California.

28 /S/ Sheeva J. Ghassemi-Vanni

1 Sheeva J. Ghassemi-Vanni
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FENWICK & WEST LLP
ATTORNEYS AT LAW